

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	) <b>Case No.: 1:15CR-069</b>
	)
<b>Plaintiff,</b>	)
	)
<b>vs.</b>	) <b>MOTION TO MAINTAIN INMATE AT</b>
	) <b>CURRENT FACILITY</b>
	)
<b>JASON GMOSER,</b>	)
	)
<b>Defendant.</b>	)
	)

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Now comes the Defendant, by and through undersigned counsel, and hereby requests this honorable Court to issue an order allowing inmate Jason Gmoser, to be allowed to remain in his current placement in the Butler County Jail, in Hamilton, Ohio. Inmate Gmoser has been placed there for several months. In the alternative, Defendant also has an upcoming dental appointment scheduled in Hamilton, Ohio and we would ask that he be allowed to maintain that appointment. This appointment is to finish work that has already been started and has already been paid for. Due to the close proximity to the court and counsel we ask the court to allow inmate Jason Gmoser to be maintained at his current placement.

Respectfully submitted,  
CAPARELLA-KRAEMER & ASSOC., LLC

By: s/Bradley M. Kraemer  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing has been served upon Counsel of Record via e-mail on this 17<sup>th</sup> day of May, 2022.

s/Bradley M. Kraemer  
Bradley M. Kraemer (0070329)  
Attorney for Defendant